

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

ALEXANDER KONSTANTINOVICH
TVERDOKHLEBOV,

Defendant.

CRIMINAL NO.: 1:17-CR-9

**GOVERNMENT'S SUPPLEMENTAL MOTION TO REVOKE RELEASE ORDER AND ORDER
DEFENDANT DETAINED**

The Government files this motion in further support of its motion to revoke Magistrate Judge Walsh's release order and order the defendant, Alexander Tverdokhlebov ("Defendant" or "Tverdokhlebov"), detained. This supplemental motion sets forth further facts in support of the Government's position and attaches, at Exhibit A, a copy of the Magistrate Judge's release order.

On February 7, 2017, law enforcement executed a search of a fourth safe-deposit box, located in Las Vegas, belonging to Defendant. The search of the box yielded approximately **\$100,000 in \$100 bills**, as well as two digital devices. This, in combination with the \$172,000 recovered from the previous searches of three safe-deposit boxes located in Los Angeles, results in a total of **\$272,000** of unexplained cash. The large quantity of cash, as well as their distribution in safe-deposit boxes in different states, suggests that Defendant may have concealed funds elsewhere in preparation for flight.

Detention is warranted because no condition or combination of conditions is sufficient to assure the appearance of Tverdokhlebov. While the release order contains a condition of a \$100,000 bond secured by deed that may be difficult for the average person to obtain,

Tverdokhlebov is no average person. The cash discovered in just the last several days demonstrates personal wealth surpassing the value of the bond requirement. Such wealth, if concealed in other places accessible to criminal associates, would provide a means for Defendant to purchase property (via a proxy) to secure his release on bond and his eventual flight from law enforcement. The conditions of supervision, too, provide inadequate assurance of his future appearance. Defendant's ingenuity, criminal sophistication, and ties to Russia make it far likelier that he will travel the 140 miles from Los Angeles to Mexico, and ultimately to Russia, rather than travel the roughly 2,600 miles from Los Angeles to Alexandria, at his own expense, for further prosecution.

In addition, the Government believes that Defendant may have submitted a false financial affidavit to the magistrate court in his application for court-appointed counsel insomuch as the Government suspects that Defendant did not disclose the \$272,000 in cash he held in four safe-deposit boxes. The Government moved the magistrate court to allow the Government to review a copy of Defendant's financial affidavit in order to confirm his false statement. After a telephonic hearing on February 8, 2017, Magistrate Judge Walsh ruled that the financial affidavit would remain under seal until the conclusion of this case, but provided that it would be made available to the Court for its review in connection with this motion.

Conclusion

For these reasons and those set forth in the Government's opening papers, the United States respectfully requests, pursuant to 18 U.S.C. § 3145(a), that the Court revoke the release order and direct that Defendant be detained pending trial.

Respectfully submitted,

Dana J. Boente
United States Attorney

By: _____/s/_____

Laura Fong
Kellen S. Dwyer
Assistant United States Attorneys

February 9, 2017

Certificate of Service

I hereby certify that on February 9, 2017, served the forgoing document on the following defense counsel of record via e-mail:

William Bruce Cummings
William B Cummings PC
P.O. Box 1177
Alexandria, VA 22313
(703) 836-7997
Fax: 703-836-0238
Email: wbcpclaw@aol.com

By: _____/s/_____

Laura Fong
Kellen S. Dwyer
Assistant United States Attorneys
United States Attorney's Office
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, Virginia 22314
(703) 299-3934
Fax: (703) 299-3981
laura.fong@usdoj.gov
kellen.dwyer@usdoj.gov